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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

RICHARD ZEITLIN, ADVANCED
TELEPHONY CONSULTANTS, MRZ
MANAGEMENT, LLC, DONOR
RELATIONS, LLC, TPFE, INC., AMERICAN
TECHNOLOGY SERVICES, COMPLIANCE
CONSULTANTS, CHROME BUILDERS
CONSTRUCTION, INC., and UNIFIED
DATA SERVICES,

Plaintiffs,

V.

BANK OF AMERICA, N.A., and JOHN and JANE DOES 1-100.

Defendants.

Case No.: 2:18-cv-01919-RFB-BNW

**STIPULATION AND ORDER TO
EXTEND TIME TO FILE RESPONSE
TO AND REPLY IN SUPPORT OF
PLAINTIFFS' RULE 37(d) AND RULE
37(a) MOTION FOR SANCTIONS AND
TO COMPEL FOR DEFENDANT'S
FAILURE TO PRODUCE A PROPER
RULE 30(b)(6) DEPONENT**

(FIRST REQUEST)

Pursuant to Local Rules IA 6-1, 7-1, and 7-2, Plaintiffs Richard Zeitlin; Advanced Telephony Consultants; MRZ Management, LLC; Donor Relations, LLC; TPFE, Inc.; American Technology Services; Compliance Consultants; Chrome Builders Construction, Inc.; and Unified Data Services (the “Plaintiffs”) and Defendant Bank of America, N.A. (“BANA”), by and through their respective undersigned counsel of record, submit this Stipulation and Proposed Order for a 2-week extension of BANA’s deadline to file its response to Plaintiffs’ Rule 37(d) and Rule 37(a) Motion for Sanctions and to Compel for Defendant’s Failure to Produce a Proper

1 Rule 30(b)(6) Deponent (ECF No. 148) (the “Motion”). The Motion was filed on August 4, 2021
2 and is set for hearing on September 28, 2021. The Parties request an extension from August 18,
3 2021, BANA’s current deadline to respond, to September 1, 2021.

4 The Parties also request that the deadline for Plaintiffs to file a reply in support of their
5 Motion be extended to September 15, 2021. Plaintiffs’ deadline to file a reply is currently seven
6 days after BANA files its response.

7 This is the Parties’ first request for an extension of the briefing deadlines for the Motion
8 and is not intended to cause any delay or prejudice to any party. The reason for the extension is to
9 give the Parties time to evaluate and respond to the arguments set forth in the Motion and
10 BANA’s response to the Motion.

11 **IT IS HEREBY STIPULATED AND AGREED** by and between the Parties that the time
12 for BANA to file their response to the Motion is extended to and through September 1, 2021 and
13 the time for Plaintiffs to file their reply in support of the Motion is extended to and through
14 September 15, 2021.

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1 IT IS SO STIPULATED.

2 Dated: August 5, 2021

Dated: August 5, 2021

3 THE BERNHOFT LAW FIRM, S.C.

4 SNELL & WILMER L.L.P.

5 /s/ Daniel James Treuden

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15 *Attorneys for Plaintiffs*

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17 IT IS SO ORDERED

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19 DATED: August 09, 2021

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24 BRENDА WEKSLER
25 UNITED STATES MAGISTRATE JUDGE
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